

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE:

Iron Eagle Inc.  
61-1931944  
PO Box 2601  
Wylie, TX 75098

Debtor.

Case No.: 23-42145

Chapter: 11

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REORGANIZED DEBTOR'S MOTION TO ADMINISTRATIVELY CLOSE CASE

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21-DAY NEGATIVE NOTICE

Your rights may be affected by the relief sought in this pleading. You should read this pleading carefully and discuss it with your attorney, if you have one in this bankruptcy case. If you oppose the relief sought by this pleading, you must file a written objection, explaining the factual and/or legal basis for opposing the relief.

No hearing will be conducted on this motion unless a written objection is filed with the Clerk of the United States Bankruptcy Court and served upon the party filing this pleading WITHIN TWENTY ONE (21) DAYS FROM THE DATE OF SERVICE shown in the certificate of service unless the court shortens or extends the time for filing such objection. If no objection is timely served and filed, this pleading shall be deemed to be unopposed, and the court may enter an order granting the relief sought. If an objection is filed and served in a timely manner, the court will thereafter set a hearing with appropriate notice. If you fail to appear at the hearing, your objection may be stricken. The court reserves the right to set a hearing on any matter.

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

**COMES NOW**, Iron Eagle, Inc., the Reorganized Debtor in the above-styled and numbered case (the "**Debtor**"), and files this *Reorganized Debtor's Motion to Administratively Close Case* ("**Motion**"). In support of the Motion, the Debtor would respectfully show the Court as follows:

1. This case was commenced by the filing of a voluntary petition under Chapter 11 of the United States Bankruptcy Code on **November 8, 2023** (the "**Petition Date**").

2. Behrooz Vida has been appointed as the Subchapter V Trustee ("Trustee").

3. The Debtor filed its Second Amended Plan of Reorganization on June 10, 2024, [Docket Entry No. 112] (the "Plan").

4. This Court confirmed the Plan by order entered on October 15, 2024, [Docket Entry No. 130].

5. The Effective Date of the Plan was November 28, 2024.

6. The Plan has been substantially consummated as such term is defined in 11 U.S.C. § 1101(2) and the bankruptcy estate has been fully administered, except for the completion of plan payments and claim objections.

7. All other administrative claims and expenses have been paid in full, or appropriate arrangements have been made for the full payment thereof.

8. All litigation has concluded except to the extent that the Court has retained jurisdiction over certain pending matters and objections to claims, and undersigned counsel states that to the best of counsel's knowledge, there are no outstanding issues that would preclude the administrative closure of this case.

9. The Plan provides for the Debtor to be the disbursing agent. As such, there is little need for post-confirmation services by, and fees payable to, the Trustee.

10. It is appropriate to administratively close the Debtor's case and discharge the Trustee when a case meets the statutory requirements for closing under Rule 3022 and the Trustee is not the disbursing agent. *See, In re Lager*, Case No. 22-30072-MVL11, 2024 Bankr. LEXIS 1974; 2024 WL 3928157 (Bankr. N.D. TX Aug. 22, 2024).

WHEREFORE Debtor respectfully requests an order administratively closing this case, provided that such order shall not operate to close the case for purposes of 11 U.S.C. § 362(c)(2)(A), or Fed. R. Bankr. P. 4006; and for such other and further relief as is just and proper.

Respectfully submitted,

Dated: January 4, 2025

/s/ Robert T. DeMarco

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**Counsel for Reorganized Debtor**

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that true and correct copies of the foregoing pleading and all attachments were served upon all parties listed below in accordance with applicable rules of bankruptcy procedure on this **4<sup>th</sup> day of January 2025**. Where possible, service was made electronically via the Court's ECF noticing system or via facsimile transmission where a facsimile number is set forth below. Where such electronic service was not possible, service was made via regular first-class mail.

**DEBTOR**

**Iron Eagle Inc.**

PO Box 2601

Wylie, TX 75098

**TRUSTEES**

**Office of the United States Trustee**

110 North College Avenue, Room 300

Tyler, Texas 75702

**Behrooz Vida**

Subchapter V Trustee

3000 Central Drive

Bedford, TX 76021

**SEE ATTACHED MATRIX**

*/s/ Robert T. DeMarco*

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